

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF DELAWARE

FILED
CLERK U.S. DISTRICT COURT
DISTRICT OF DELAWARE

2005 SEP -6 PM 1:51

JIMMIE LEWIS,
PLAINTIFF,

V.

C.A NO. 04-1350 (GMS)

SYLVIA FOSTER, KATHRYN SHENEMAN,
MICHAEL S. TALMO, DIANE STACHOWSKI, HELEN HANLON,
MARGERET WILSON, DONNA LAWRENCE, GLORIA BANKS,
FLORENCE SCOTT COBB, LANCE SAPERS, DAVE MOFFITT, MALE NURSE,
R. GRAY, C. OATES, ROSE ARES, PAT RILEY, SEGAL, J,
CURTIS CORNISH, KAREN CHAMBERLIN, TANVA WILSON,
MR. JOHN SON, J. CONYER, DR. OVRESHI, JOHN DOE,
DEFENDANTS.

MOTION FOR DISCOVERY UNDER
FED R. CIVIL PROC.

COMES NOW, THE PLAINTIFF, JIMMIE LEWIS, PRO-SE, AND
REQUEST THIS HONORABLE COURT FOR A ORDER TO HAVE
DEFENDANTS SUBMIT DISCOVERY MATERIAL REQUESTED HEREIN
TO THE PLAINTIFF AS WELL AS TO THIS HONORABLE COURT,
IN ORDER FACTUALLY VALIDATES IF DIVERSITY IS INDEED COMPLETE,
AS WELL AS TO SERVE ALL DEFENDANTS NAMED IN THE PLAINTIFF'S
AMENDED COMPLAINT WITH SAID COMPLAINT, SUMMONS & SUBPOENAS:

1.) FULL NAMES, ADDRESSES INCLUDING STATES, OF DEFENDANTS
CITED HEREIN; SYLVIA FOSTER, KATHRYN SHENEMAN, MICHAEL S.-
TALMO, DIANE STACHOWSKI, HELEN HANLON, MARGERET WILSON,
FLORENCE SCOTT COBB, LANCE SAPERS, DAVE MOFFITT, —

(CONT.) MALE NURSE, R. GRAY, C. OATES, ROSE ARES, -
PAT RILEY, SEGAL J, CURTIS CORNISH, KAREN -
CHAMBERLIN, TANYA WILSON, MR. JOHNSON, J. CONYER,
DR. OURESHI, JOHN DOE, GLORIA BANKS.

- 2.) FULL NAMES, ADDRESSES INCLUDING STATES OF ALL
PHYSICIANS, PSYCHOLOGISTS, PSYCHIATRISTS, NURSES,
NURSE ASSISTANTS, SECRETARIES, TEACHERS, MENTAL -
HEALTH ADVOCATES, WHOM WERE ON ACTIVE DUTY AND OR
CALLED TO THE WORK AT THE "MITCHELL" BUILDING
BETWEEN THE DATES OF MAY 20, 2004 AND JUNE 26, 2004,
IN WHICH WAS THE DURATION OF THE PLAINTIFF'S STAY
AT THE DELAWARE PSYCHIATRIC CENTER, IN ORDER ISSUE
COMPLAINTS, SUMMONS AND OR SUBPOENAS.
- 3.) FULL NAMES, ADDRESSES INCLUDING STATES OF ALL
PHYSICIANS, PSYCHOLOGISTS, PSYCHIATRISTS, NURSES,
NURSE ASSISTANTS, SECURITY OFFICERS, SURVEILLANCE VIDEO,
WHOM WERE ON DUTY AND OR RELEVANT TO THE PLAINTIFF
BEING SUBDUED ON THE DATE OF 6/21 - 22/04 AT THE TIME -
OF 11:00PM AND 2:00 A.M.

WHEREFORE, FOR THE FORGOING REASONS THE PLAINTIFF, JIMMIE -
LEWIS, REQUEST THAT THIS HONORABLE COURT GRANT THIS MOTION
FOR DISCOVERY IN ALL ASPECTS.

DATED: 8/28/05

Jimmie Lewis
SBI # 506622
DEL. CORR. CENTER
1181 PADDOCK RD
SMYRNA, DE 19977

FOR THE DISTRICT OF DELAWARE

JIMMIE LEWIS,
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V.

C.A.NO. 04-1350 (GMS)

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CURTIS CORNISH, KAREN CHAMBERLIN, TANYA WILSON,
MR. JOHNSON, J. CONYER, DR. OUPRESHI, JOHN DOE,
DEFENDANTS.

ORDER

AND NOW, TO WIT, THIS 28TH DAY OF AUGUST, 2005, HAVING
CONSIDERED THE PLAINTIFF'S MOTION FOR DISCOVERY UNDER -
FED R. CIVIL PROC; AND RESPONSE THERETO IF ANY :

IT IS HEREBY ORDERED THAT THE PLAINTIFF'S MOTION FOR
DISCOVERY HAS BEEN GRANTED.

BY THE COURT :

THE HONORABLE GREGORY M. SLEET

JIMMIE LEWIS,
PLAINTIFF,

V.

C.A NO -04-1350 (GMS)

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CURTIS CORNISH, KAREN CHAMBERLIN, TANYA WILSON,
MR. JOHNSON, J. CONYER, DR. OURESHI, JOHN DOE,
DEFENDANTS.

CERTIFICATE OF SERVICE

I, THE UNDERSIGNED, DO HEREBY CERTIFY ON THIS 28TH DAY OF
AUGUST, 2005 THAT (2) TRUE AND CORRECT COPIES OF PLAINTIFF'S
MOTION FOR DISCOVERY UNDER FED. R. CIVIL PROC. HAS BEEN
SERVED BY U.S. POSTAGE TO THE FOLLOWING:

CYNTHIA G BEAM ESQ #2565
1001 JEFFERSON PLAZA, SUITE 202
WILMINGTON, DE 19801
ATTORNEY FOR SYLVIA FOSTER M.D

DATED: 8/28/05

Jimmie Lewis
SBI # 306622
DEL. CORR. CENTER
1181 PADDOCK RD
SMYRNA, DE 19977

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C.A. No 04-1350 (GMS)

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MR. JOHNSON, J. CONYER, DR. OVRESHI, JOHN DOE,
DEFENDANTS.

CERTIFICATE OF SERVICE

I, THE UNDERSIGNED, DO HEREBY CERTIFY OF THIS 28TH DAY OF
AUGUST, 2005 THAT (1) TRUE AND CORRECT COPY OF THE PLAINTIFFS
MOTION FOR DISCOVERY UNDER FED R. CIVIL PROC, HAS BEEN SERVED
BY U.S. POSTAL TO THE FOLLOWING:

JUDGE GREGORY M. SLEET
UNITED STATE DISTRICT COURT
J. CALEB BOGGS FEDERAL BUILDING
844 N. KING ST, LOCKBOX 19
WILMINGTON, DE 19801

Jimmie Lewis
SBI # 306622
DEL. CORR. CENTER
1181 PADDOCK RD
SMYRNA, DE 19977

DATED: 8/28/05

IM Jimmie Lewis

SBI# 506622 UNIT A-u-7

DELAWARE CORRECTIONAL CENTER

1181 PADDOCK ROAD

SMYRNA, DELAWARE 19977

FILED
CLERK U.S. DISTRICT COURT
DISTRICT OF DELAWARE

15:11 PM 9-SEP-2005

JUDGE GREGORY M. SLEET

UNITED STATES DISTRICT COURT

844 N. KING ST, LOCKBOX 19

WILMINGTON, DELAWARE

19801

U.S.M.S.
X-RAY

